

1

January 13, 2023

UNITED STATES DISTRICT COURT DISTRICT OF  
MASSACHUSETTS  
U.S. DISTRICT COURT

Civil Action No. 1:22-CV-10889-RGS

X  
X  
X  
X  
X  
X  
X

2023 JAN 13 AM 10:54  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
CLERK'S OFFICE  
X  
X  
X  
X  
X  
X  
X

SECURITIES AND EXCHANGE COMMISSION vs. Trends  
Investments Inc., Brandon Rossetti, Clinton Greyling, Leslie Greyling,  
Roger Bendelac and Thomas Capellini  
Defendants  
HONORABLE RICHARD G. STEARNS, PRESIDING

**EMERGENCY MOTION FOR RELIEF WITH FACTUAL SUPPORT OF THE REQUESTS MADE IN MOTION # 76  
IN LIGHT OF FACTS NEWLY DISCOVERED RENDERING ORDER# 37 MOOT AND FURTHER SUPPORT FOR  
REQUEST TO EXTENSION OF VENUE APPEAL TO FEBRUARY 3, 2023.**

Roger Bendelac ("RB") moves the Court to ISSUE A SUBPOENA TO DEFENDANT CLINTON GREYLING ON  
HIS BEHALF FOR A DEPOSITION ON THE BASIS OF NEWLY DISCOVERED FACTS.

IN SUPPORT OF MOTION # 76, IMPROPER SETTLEMENT AS TO CLINTON GREYLING AND  
DISCRIMINATION AMONG DEFENDANTS BY THE SEC BY PROVIDING ADVANCED INFORMATION  
WITHOUT DISCLOSURES TO THE COURT AND CONTINUOUS INTERACTIONS WITH DEFENDANT CLINTON  
GREYLING WHILE DENYING A KEY WITNESS WITH KNOWLEDGE REQUIRED FOR THE APPROPRIATE  
DEFENSE OF DEFENDANTS ROGER BENDELAC AND THOMAS CAPELLINI TO THE EXTENT OF THE LATEST  
BEING ACCUSED OF AIDING AND ABETTING THE FORMER.

EXHIBIT 1 IS THE PROPOSED JUDGMENT AND CONSENT AND IS ATTACHED TO THE PRESENT FILING.

THE PROPOSED JUDGEMENT IS DATED THE DATE OF THE FILING OF THE COMPLAINT JUNE 8, 2022. THE CONSENT SIGNED BY ALLEGEDLY SETTLED DEFENDANT CLINTON GREYLING BEARS A NOTARY CONFIRMATION DATED MAY 5, 2022, NOTARY JANELLE WILKINSON FROM THE STATE OF FLORIDA, COMMISSION# HH 23812. THUS, THE CONSENT IS DATED PRIOR TO THE PUBLIC AVAILABILITY OF THE PROPOSED JUDGMENT. THAT TECHNICALLY RENDERS ORDER # 37 MOOT AND NULLIFIES IT AS NO ONE CAN ASSENT TO A FUTURE DOCUMENT UNLESS IT WAS IMPROPERLY PREPARED WITH NEFARIOUS INTENT ON THE PART OF THE SEC.

THIS CONFIRMED THE INAPROPRIATE ACTIONS OF THE SEC THAT ALONG WITH THE US DA POTENTIALLY AFFECTED ANY TESTIMONY OF DEFENDANT CLINTON GREYLING OR EVIDENCE PROVIDED THROUGH HIM. FURTHERMORE, DEFENDANT CLINTON GREYLING THE ONLY PARTY IN CONTROL OF TRENDS INVESTMENTS INC HAD THAT ENTITY DEFAULT ON ALL RESPONSES AND THE RECORDS ARE ONLY IN HIS CONTROL AND IN THE SEC 'S CONTROL. THUS, THE COMPLAINT IS FATALY FLAWED AS IT WAS OBVIOUSLY TAILORED WITH DEFENDANT CLINTON GREYLING AND HIS ATTORNEY RECEIVING PROMISES ON BOTH TRACKS TO BE INDUCED INTO A PROPOSED CONSENT JUDGMENT. FURTHER THAT COMPLAINT WAS IMPROPERLY TAILORED TO THAT DEFENDANT FOR WEEKS PRIOR TO THE FILING OF THE COMPLAINT. FOR WEEKS PRIOR TO THE PUBLIC AVAILABILITY OF THE COMPLAINT THE COMPLAINT WAS IN THE HAND OF DEFENDANT CLINTON GREYLING AND HIS ATTORNEY WITH IMPROPER PRE-KNOWLEDGE OF THE COMPLAINT AND AN ABILITY TO HELP TAILOR IT AS THEY WERE NEGOTIATING WITH INTENT TO INFLUENCE. OTHERWISE, WHY A DEFENDANT WHO PARTAKED INTO THE \$ 2.3 MILLION IS BUILDING A CASE WITH THE SEC ON DEFENDANTS THAT RECEIVED ZERO BENEFITS OR COMPENSATION AND WE NOW KNOW WERE NOT PART OF ANY SCHEME.

THEN THE CONSENT JUDGMENT SIGNED MORE THAN A MONTH PRIOR TO THE PROPOSED JUDGMENT DATE, THUS CONFIRMING THAT THE COURT ERRED IN AGREEING TO THE SETTLEMENT IF THE PURPOSE WAS TO BRIBE HIM INTO ACCEPTING A FALSE NARRATIVE AND THE ONLY REMEDY IS THE ABILITY TO QUESTION DEFENDANT CLINTON GREYLING UNDER OATH AND ALSO THE ABILITY TO QUESTION THE SIGNER OF THE COMPLAINT DAVID SCHEFFLER UNDER OATH AND THUS DEFENDANT BENDELAC REQUIRES A SUBPOENA TO ALSO BE ISSUED BY THIS COURT TO ATTORNEY DAVID SCHEFFLER FOR INVESTIGATION OF THE CONSTITUTIONAL PROPRIETY OF WHAT HAS OCCURRED AND WHAT PROMISES WERE MADE TO ALLOW A FALSE NARRATIVE IN THE COMPLAINT. THE SUBPOENAS HAVE TO BE ISSUED BY THE COURT FOR DEFENDANT ROGER BENDELAC SINCE HE IS A PRO SE LITIGANT WITH NO ABILITY TO ISSUE ON HIS OWN ACCORDING TO INFORMATION AND BELIEF.

THE ULTIMATE RELIEF AND ONLY TRULY FAIR RELIEF IS A SIMPLE DISMISSAL OF THE COMPLAINT WITH NO PREJUDICE GIVING THE ABILITY TO THE SEC TO BRING AN ACTION IN THE PROPER VENUE AGAINST DEFENDANTS ROGER BENDELAC AND THOMAS CAPELLNI ALONE AS THE OTHER DEFENDANTS ARE EITHER IN DEFAULT OF A RESPONSE OR ALLEGEDLY SETTLED, HOWEVER, ULTIMATE FAIRNESS WOULD BE A DISMISSAL WITH PREJUDICE SO THAT THE SEC DOES NOT ACT ILLEGALLY IN THE FUTURE.

IN ADDITION, DEFENDANT ROGER BENDELAC ALTERNATIVELY REITERATES HIS DEMAND FOR AN EXTENSION OF HIS RIGHT TO AN INTERLOCUTORY APPEAL OF THE TRANSFER TO THE SOUTHERN DISTRICT SINCE CONTRARY TO THE COURT ORDER ON THAT MATTER THE DEMAND FOR AN EXTENSION WAS MADE WITHIN THE REQUIRED TIME LIMITS ON DECEMBER 30, 2022( SEE STAMP OF RECEIPT BY THE COURT), THE TIME LIMIT BEING JANUARY 3, 2023 AND THE DEMAND TO EXTEND FOR 30 DAYS WAS APPROPRIATE IN LIGHT OF THE PRO SE STATUS OF THE DEFENDANT AND THE NEED TO GET TO SPEED

ON MAKING THE SERIOUS REQUIREMENTS OF AN APPEAL TO THE FIRST CIRCUIT, IN THE EVENT THE COURT DOES NOT OPT FOR THE REAL RELIEF THE DISMISSAL OF A FLAWED AND CORRUPTLY CONCOCTED COMPLAINT . THE CLOCK ONLY STARTED ON NOVEMBER 3, 2022, AT THE TIME OF THE DENIAL OF THE MOTION TO RECONSIDER, ON THAT REQUEST, THE SEC HAS INDICATED TO DEFENDANT RB THAT IT HOLDS NO POSITION.

THIS DEFENDANT IS ALSO AWARE THAT ATTORNEY GEOFFREY NATHAN IS IN CONTINUOUS PRODUCTION OF TESTIMONY AND DOCUMENTS TO THE SEC WHILE DEFENDANT ROGER BENDELAC IS DENIED THE MEANS TO DEFEND THE SERIOUS ALLEGATIONS MADE WITH FALSE ASSERTED FACTS IN THE COMPLAINT AS DEMONSTRATED IN # 76 MOTION. THAT CREATES AN IMPOSSIBLE FAIR TRIAL IN THIS CASE ALREADY. THE COURT SHOULD NOT CONDONE THIS PARTICULARLY WHEN CHOREOGRAPHED WITH THE US DA, AS NO ONE CAN BELIEVE THE SEC CANNOT PROVIDE THE ANSWERS AND DOES NOT HAVE THE ANSWERS TO THE QUESTIONS ASKED BY THIS PARTY. KNOWING IT WAS A CIVIL PROCEEDING THE SEC PLAYED A TRICKY GAME AND SHOULD NOT BE ENCOURAGED TO VIOLATE PROCEDURES AND RIGHTS. IT WAS ITS CHOICE NOT TO TAKE NOTES AND THEY DID IT TO AFFECT THE FAIRNESS OF THE PROCESS KNOWING THE FALSITY OF THEIR ALLEGATIONS AGAINST THIS DEFENDANT.

RESPECTFULLY SUBMITTED,

ROGER BENDELAC

s/s Roger Bendelac

ROGER BENDELAC PRO SE DEFENDANT

575 Madison Avenue, suite 1006

New York, NY 10022

TEL 9179824565

EMAIL: rbendelac@yahoo.com